



Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

00-RU-0434

Mr. Philip O. Strawbridge
Transition Manager
BNFL Inc.
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Strawbridge:

REGULATORY UNIT (RU) COMMENTS ON BNFL RESPONSE TO PERSONNEL TRAINING AND QUALIFICATION INSPECTION REPORT IR-00-003

- References:
- (1) BNFL letter 013062 to D. C. Gibbs, RU, from A. J. Dobson, "Contract No. DE-AC27-96RL13308 – W375 – Response to Personnel Training and Qualification Inspection Report, IR-00-003" dated May 31, 2000
 - (2) DOE letter 00-RU-0310 to M. J. Bullock, BNFL, from D. C. Gibbs, "Personnel Training and Qualification Inspection Report, IR-00-003," dated April 5, 2000
 - (3) DOE Letter 00-RU-0214 to M. J. Bullock, BNFL, from D. C. Gibbs, "Regulatory Unit (RU) Comments on BNFL Response to Safety Integration Inspection Report IR-99-008," dated February 8, 2000

The RU has reviewed the requested information in the BNFL Inc. (BNFL) response (Reference 1) to the Personnel Training and Qualification Inspection Report, IR-00-003 (Reference 2). Based on the review, the RU has concluded that your response is not acceptable. Enclosed is a discussion of the deficiencies in your response that resulted in this conclusion. You are requested to submit, within 15 days, a supplemental response that addresses the deficiencies discussed in the enclosure.

The RU has previously brought to BNFL's attention the issue of responses to Findings lacking sufficient specific detail (Reference 3). Based on the response to the Personnel Training and Qualification Inspection Report, IR-00-003 and previous responses (Standards Selection Process, IR-99-006, ALARA Design, IR-99-004, Safety Integration, IR-99-008, and Authorization Basis Management, IR-99-007), there appears to be repetitive failure of BNFL to ensure that responses to RU Findings are complete and contain sufficient detail for the RU to assess the adequacy of the corrective actions. In particular, it is necessary for BNFL to describe what actions are intended to prevent recurrence of the events that led to the Finding. It is also necessary that BNFL realize that when responding to RU Findings, it is not acceptable to advise the RU that BNFL has a plan for corrective action without informing us what elements of the plan will prevent future recurrence.

Mr. Philip O. Strawbridge
00-RU-0434

-2-

Nothing in this letter should be construed as changing the Contract (DE-AC27-96RL13308). If you have any questions, please contact me or Pat Carrier of my staff on (509) 376-3574.

Sincerely,

D. Clark Gibbs, Regulatory Official
Office of Safety Regulation
of the RPP-WTP Contractor

REG: NKH

Enclosure:
Summary of Personnel Training and Qualification
Inspection Report Response Deficiencies

cc w/encl:
D. A. Klein, BNFL